
TECHNICAL HANDBOOK FOR
ENVIRONMENTAL HEALTH AND ENGINEERING
VOLUME VI - FACILITIES ENGINEERING
PART 75 - ENVIRONMENTAL ASSESSMENTS/REMEDIATION

CHAPTER 75.3 GUIDELINES FOR THE ENVIRONMENTAL REMEDIATION SPECIAL STUDIES

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75-3.1 INTRODUCTION

This section provides information on the 'special studies' activity of the environmental remediation process. The purpose of the special study is to expand on the information obtained in the environmental assessment related to a finding, or group of related findings. The special study will generally involve a much more detailed look at the finding, including more comprehensive testing and sampling. The primary aim of the special study will be to define what needs to be done to correct an environmental deficiency, often delineating the scope of the work involved for accomplishing the remedial action. In some instances the special study may also include the preparation of contract documents to perform the remediation.

75-3.2 DEFINITIONS

Finding - A specific item reported as part of a facility assessment. Generally these findings are items needing correction due to lack of compliance with regulations, laws or policies. However, these may also be examples of good management practices that are noteworthy or items that are not currently in violation but may or will be in the future due to poor management practices or changing regulations, laws, or policies.

75-3.3 REQUIREMENT

a. Special Study Requirement

When a special study is needed it will be used to define the scope and extent of an assessment finding, including potential for environmental liability and the extent of remediation needed. The special study may also finalize what actions are needed to close out a finding. Responses documented in a special study could range from "no further action required" to recommendations for one or more administrative procedures or engineering solutions for remediation of the finding.

b. Funding

A special study may be considered for funding by the Steering Committee if the cost of the study exceeds the "Area" thresholds,

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and the Area is unable to fund the work utilizing locally available resources. When the costs of special studies are below the thresholds as defined in the Technical Handbook chapter Guidelines for the Environmental Remediation Activities Funding and Prioritization, they should initially be funded by the Area. Special study funding by the Area may be reimbursed from the environmental remediation project when it is subsequently funded by the Steering Committee.

75-3.4 PROCESS

a. Steering Committee Funding

Work on a special study can begin at anytime if funding is available within the Area. Where funding is needed from the Environmental Remediation Fund (ERF) requests can be made to the Steering Committee (SC) by an Area. Annually, Areas will provide the SC with a listing of facilities, both Federal and Tribal, needing ERF special study funding.

b. Special Study Team Technical Expertise

In contrast to those persons conducting Environmental Preassessment and Assessment activity (where the team often consists of a generalist plus one or more specialists), special studies will normally be staffed with technical expertise which is very focused upon the finding which is being investigated. For example, if it is a ground water contamination problem, the technical resource may include a mix of hydrogeology, environmental chemistry, and risk assessment expertise. Whereas, if the problem is associated with lead or asbestos, an industrial hygienist backed up with laboratory support would most likely be the appropriate technical resource.

Flexible and responsive resources are needed to support the special study process. Assignment of external resources to supplement and/or fully perform special studies will be based on such factors as complexity and extent of the finding, availability of resources, and efficiency. Studies at tribally owned facilities and those facilities being transferred to a tribal government should normally be performed by outside contractors. Statements of the qualifications of contractors should be included with the final report to assist in establishing the credibility of result relative to historical references made in the future.

c. Special Study

Special studies are always dictated by the suspected or known environmental deficiency being addressed. This generally involves gathering information about what is known about the

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deficiency (documents, interviews, physical observations) and than developing a study plan. The plan will include a definition of what is known about the problem, what objectives are intended to be achieved by the plan and the recommended approach for further fact finding and analysis. Special studies can vary from being very brief to being fairly extensive, depending upon the nature and extent of the problem. Extensive studies should include periodic milestones, where the person or organization doing the work conferences frequently with the IHS individual responsible for the study. The purpose of these meetings is to periodically assess progress, and to determine whether or not there needs to be adjustments in the direction or scope of the work. Depending upon the circumstances, the IHS representative may want to involve others in these reviews e.g. Service Unit or Area representative, and/or Tribal equivalence where applicable.

d. Special Study Review and Validation

Findings of the special study will remain in draft status until reviewed and validated by the Area Associate Director, Office of Environmental Health and Engineering. The validation process will include input from appropriate Headquarters, Area, tribal, and Service Unit environmental health, engineering, administrative and facilities maintenance staff.

Review and comment on assessments can be via telephone conferences by all parties.

For special studies prepared by contractors, it is recommended that a prefinal be submitted for final check prior to distribution.

A distribution of Final validated special studies will be as follows:

- Area: 2 copies (one for affected Service Unit)
- Engineering Services - Seattle: 2 copies
- Engineering Services - Dallas: 1 copy for ES-D supported Areas
- Headquarters: 1 copy

Coordination for distribution to tribal representatives will be through the Area.

e. Special Studies Information Repository

Copies of all special studies will be maintained in IHS Headquarters and in Engineering Services-Seattle.

f. Resources for Conduct of Studies

Areas will need to coordinate with their respective ES for the use of contract and/or interagency agreement resources for the conduct of special studies.

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g. Corrective Actions

Corrective/remediation actions needed as a result of the special study will vary in size and in complexity.

Securing of funding for remediations is outlined in the section Environmental Remediation Activities Funding and Prioritization of the Technical Handbook for Health Facilities.

The facility operator has the ultimate legal responsibility for required corrective action. The various laws assign responsibility. Note that failure to request funding that is outside the scope of local abilities or authorities has resulted in legal actions against those responsible.

75-3.5 RESPONSIBILITIES

Service Unit:

- request special study to Area
- participate as needed in study
- participate in study report review
- corrective actions on findings

Area:

- request special study to ES depending on funding limits
- validate special study
- participate as needed in study
- participate in study report review
- corrective actions on findings as needed

Headquarters:

- participate in special study review as needed

Engineering Services

- maintain contract and manage contractor
- participate in special study report reviews